

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ELIZABETH PANZARELLA and JOSHUA
PANZARELLA, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

NAVIENT SOLUTIONS, LLC,

Defendant.

No. 2:18-cv-03735-PBT

EIGHTH STIPULATION AND PROPOSED ORDER

Plaintiffs Elizabeth Panzarella and Joshua Panzarella (together, "Plaintiffs") and defendant Navient Solutions, LLC ("Defendant"), by and through their respective counsel of record, stipulate as follows:

WHEREAS, Plaintiffs filed a Motion to Compel Discovery (the "Motion") on June 6, 2019 (Doc. 25);

WHEREAS, Defendant's response to the Motion was originally due on June 20, 2019;

WHEREAS, on June 18, 2019, the parties filed a stipulation to extend Defendant's deadline to June 27, 2019;

WHEREAS, on June 19, 2019, the court granted the stipulation;

WHEREAS, on June 25, 2019, the parties filed a second stipulation to extend Defendant's deadline to July 9, 2019;

WHEREAS, on June 26, 2019, the court granted the second stipulation;

WHEREAS, on July 9, 2019, the parties filed a third stipulation to extend Defendant's deadline to July 16, 2019;

WHEREAS, on July 10, 2019, the court granted the third stipulation;

WHEREAS, on June 16, 2019, the parties submitted a fourth stipulation to extend Defendant's deadline to July 23, 2019;

WHEREAS, on July 18, 2019, the court granted the stipulation;

WHEREAS, on July 19, 2019, the parties submitted a fifth stipulation to extend Defendant's deadline to August 6, 2019;

WHEREAS, on July 22, 2019, the court granted the stipulation;

WHEREAS, on August 5, 2019, the parties submitted a sixth stipulation to extend Defendant's deadline to August 13, 2019;

WHEREAS, on August 8, 2019, the court granted the stipulation;

WHEREAS, on August 13, 2019, the parties submitted a seventh stipulation to extend Defendant's deadline to August 20, 2019;

WHEREAS, on August 14, 2019, the court granted the stipulation;

WHEREAS, to facilitate the parties' further attempts to resolve the issues addressed in the Motion, the parties have agreed to further extend the date by which Defendant must respond to the Motion by an additional seven (7) days, from August 20, 2019, to August 27, 2019.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their respective counsel of record, that Defendant's time to respond to the Motion is extended by seven (7) days, to and including August 27, 2019.

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Dated: August 19, 2019

Respectfully submitted,
GREENBERG TRAURIG, LLP

By: /s/ Lisa M. Simonetti

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Respectfully submitted,
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By: /s/ Robert P. Cocco (by permission)

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*Attorneys for Plaintiffs
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PURSUANT TO THE STIPULATION, IT IS SO ORDERED:

DATED: 8/27/19

Petrese B. Tucker
HON. PETRESE B. TUCKER
UNITED STATES DISTRICT JUDGE